UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 03 2016

CERTIFIED MAIL 7009 1680 0000 7669 1864
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Brian Delarosa
Health and Safety Supervisor
Nemak USA, Incorporated
4243 Gateway Drive
Sheboygan, Wisconsin 53082

Re: Notice of Violation
Compliance Evaluation Inspection
WIR 000 141 655

Dear Mr. Delarosa:

On February 16, 2016, a representative of the U.S. Environmental Protection Agency inspected the Nemak USA, Incorporated facility located in Sheboygan, Wisconsin (Nemak). As a small quantity generator of hazardous waste, Nemak is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate Nemak's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Nemak, EPA's review of records pertaining to Nemak, and the inspector's observations, EPA has determined that Nemak has unlawfully stored hazardous waste without a license or interim status as a result of Nemak's failure to comply with certain conditions for a license exemption under Wis. Admin. Code § NR 662.192(1)(a)-(e) [40 C.F.R. § 262.34(d)-(f)]. EPA has identified the license exemption conditions with which Nemak was out of compliance at the time of the inspection in paragraphs 1, below.

Also, EPA has determined that Nemak violated RCRA requirement related to used oil labeling, as described in paragraph 2, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF LICENSE EXEMPTION REQUIREMENTS

At the time of the inspection, Nemak was out of compliance with the following small quantity generator license exemption conditions:

1. Emergency Procedures

Under Wis. Admin. Code §§ NR 662.192(1)(e)(2)(a), (b) and (c) [40 C.F.R. §§ 262.34(d)(5)(ii)(A), (B), and (C)], a small quantity generator must post the name and telephone number of the emergency coordinator next to the telephone, the location of fire extinguishers and spill control material, and if present, fire alarm, and the telephone number of the fire department, unless the facility has a direct alarm.

At the time of the inspection, Nemak had posted facility telephone stickers indicating "Emergency Contact Information" showing the Health Room telephone number. The Health Room Emergency Notification Telephone List did have Nemak Emergency Response Coordinators listed by Nemak position (e.g., Plant Manager) with office and cell phone numbers, but it did not include the person's name. The Health Room Emergency Notification Telephone List did include the Sheboygan Fire Department telephone number, and referenced section 13, 14, and 15 of the Spill Prevention Control and Countermeasures Plan in the event of a spill situation. Nemak should update its Health Room Emergency Contact List to include the names of the emergency response coordinators and the location of fire extinguishers and spill control material, and if present, fire alarm.

OTHER VIOLATION

2. Used Oil Requirement

Under Wis. Admin. Code § NR 679.22(3)(a) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection of the 1600 Ton area, at least two 5-gallon containers and one 55-gallon container of used oil were not labeled with the words, "Used Oil," see photograph numbers 5 and 6.

At this time, EPA is not requiring Nemak to apply for a Wisconsin hazardous waste storage license so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraph 1, above.

After the inspection, as documented in a February 16, 2016 email to EPA, you took certain actions to establish compliance with the above used oil labeling requirement. Your email did not include any actions you may have taken related to paragraph number 1, above. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to

paragraph 1. You should submit your response to Mr. Walt Francis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604."

If you have any questions regarding this letter, please contact Mr. Walt Francis, of my staff, at 312-353-4921 or at francis.walt@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WDNR-Sturtevant Service Center
(michael.ellenbecker@wisconsin.gov)
Randall Malek, WDNR-Waukesha Service Center
(randall.malek@wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**NEMAK USA, INC.**
FACILITY U.S. EPA ID NO.:	**WIR 000 014 142**
FACILITY TYPE:	**Small Quantity Generator**
FACILITY ADDRESS:	4243 Gateway Drive Sheboygan, Wisconsin 53082
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE OF INSPECTION:	February 16, 2016
SIC CODE:	3341 – Secondary Smelting and Refining of Nonferrous Metals
NAICS CODE:	331314 – Secondary Smelting and Alloying of Aluminum 33631 – Motor Vehicle Gasoline Engine and Engine Parts Manufacturing 331521 – Aluminum Die-Casting Foundries

PREPARED BY: Walt Francis — 3/8/2016

Walt Francis
Environmental Scientist
Date

APPROVED BY: Walt Francis for — 3/8/2016

Julie Morris, Chief
Compliance Section 2
RCRA Branch
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at Nemak USA, Inc. (Nemak) located at 4243 Gateway Drive, Sheboygan, Wisconsin to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Wisconsin Administrative Code (WAC), with respect to Nemak's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Representatives of Nemak -
Brian Delarosa, Health, Safety and Environmental Supervisor
Murray Hawthorne, Compess, LLC, Senior Leader
Tom Friedrichs, Cardinal Environmental, Project Manager

Site Description/Background Information

Nemak specializes in the production of high complex aluminum components for the automotive industry such as cylinder heads, engine blocks, transmission parts, and structural components. Nemak has thirty-four manufacturing plants located in fifteen countries with approximately 25,000 employees. Nemak has two plants in Sheboygan, Wisconsin. The Taylor Drive facility and the Gateway Drive facility. The Gateway Drive facility melts a wide variety of scrap aluminum using several large natural-gas fired industrial melting furnaces. Some scrap streams are further processed on site using an aluminum shredder and dryer to prepare the scrap for melting. Specialized forklifts transport the molten aluminum using large ladles to numerous high pressure die casting machines that form the molten aluminum into final products that include automobile engine components and vehicle structural assemblies. Production activities involve heat treating, shot blasting and machining of castings into finished components used by customers to assemble automobiles. The total property area comprises 30 acres, with 370,000 square feet of building under the roof. Hours of operation are typically 3 shifts, 7 days per week, with an average of 800 employees. The facility was constructed in 1995 by J.L. French and purchased by Nemak about 2½ years ago. Historically, the Gateway facility has generated three main hazardous waste streams: 1) Alloy Department shredder baghouse dust which contained dirt and small debris contaminated with Polychlorinated Biphenyls (PCBs), cadmium (D006) and lead (D008); 2) aerosol can puncturing unit mounted on a 55-gallon container in the 3500 Ton bay area; and 3) broken used fluorescent lamps are shipped off-site as a mercury bearing (D009) waste. Other hazardous wastes shipped off-site have included: 1) waste phosphoric acid (D002); 2) waste shot blast filters and debris (D001); and various lab packs. Nemak Gateway personnel generate used cotton rags which are sent offsite for laundering by Industrial Towel and Uniform, Sheboygan, Wisconsin. Also, Nemak Gateway generates universal wastes and used oil. An EPA

Notification Form 8700-12 was originally submitted to EPA on May 22, 1996 for the Gateway Drive facility as a Large Quantity Generator (LQG).

At the time of the inspection, the Nemak Gateway facility was operating as a Small Quantity Generator (SQG) of hazardous waste. Historical hazardous waste streams based on the 2013 Biennial Report System (BRS) included off-site shipments of: 1) waste off-specification phosphoric acid (D002); and 2) waste shredder baghouse dust containing waste PCBs and waste cadmium. The 2013 BRS also showed that Nemak Gateway shipped the following hazardous wastes off-site: 1) mercury (D009); and 2) various lab packs. At the time of the inspection, the last off-site shipment of hazardous waste was on September 22, 2015. Other wastes include: 1) used oil; 2) used batteries; and 3) used fluorescent lamps. WDNR provided U.S. EPA with a copy of a November 16, 2015, "Hazardous Waste Manifest Records For Selected Generator" report for the period 2013 through 2014 for out-bound shipments of hazardous waste from the Sheboygan, Wisconsin facility. The WDNR out-bound manifest report indicated that hazardous waste D002, D006, U239, F005, and D009 were shipped off-site to Veolia ES Technical Solutions, LLC, Port Arthur, Texas (TXD000838896), Veolia ES Technical Solutions, Menomonee Falls, Wisconsin (WID003967148), WRR Environmental Services Company, Inc., Eau Claire, Wisconsin (WID990829475); and Clean Harbors Aragonite, LLC, Grantsville, Utah (UTD981552177); and Veolia ES Technical Solutions, Port Washington, Wisconsin (WID988566543). For the period January 27, 2014 through November 25, 2014, Nemak Gateway shipped out 57,715 pounds of hazardous waste for an average of 4,810 pounds per month. The Nemak Gateway facility had operated as an episodic LQG until they discontinued an aluminum scrap feedstock that contained cadmium and lead.

Opening Conference

U.S. EPA representative Walt Francis arrived at the Nemak Gateway facility at approximately 8:30 a.m. Inspector Francis introduced himself to Mr. Brian Delarosa, Health, Safety and Environmental Supervisor. Mr. Delarosa took the inspector to a conference room. Inspector Francis presented his credentials to Mr. Delarosa, and informed him of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA. WDNR staff were unable to participate in the inspection. Mr. Delarosa introduced Mr. Murray Hawthorne, Compess, LLC, Morrison, Colorado and Mr. Tom Friedrichs, Cardinal Environmental, Sheboygan, Wisconsin. Mr. Delarosa provided the inspector with a brief overview of the Gateway facility, and provided information on the Nemak Taylor Road facility. Mr. Hawthorne explained the various hazardous wastes generated at the Nemak Gateway facility. Inspector Francis asked Mr. Hawthorne about used oil and universal waste. Mr. Hawthorne explained to the inspector that used oil is picked up by Industrial Fluid Solutions, Sheboygan, Wisconsin and used fluorescent lamps are picked up by Envirosafe Resource Recovery, Germantown, Wisconsin (WIR000142877). Inspector Francis reviewed the 2013 BRS hazardous wastes, and discussed the operation of the facility. Nemak personnel did not make a CBI claim on the information gathered during the inspection. Inspector Francis then watched a Nemak Safety Orientation video. Mr. Delarosa allowed the inspector access to the facility to conduct the inspection.

Site Tour

The walk-through began at the aerosol can puncturing device located near the Quality Assurance Group area. Mr. Hawthorne showed Inspector Francis the aerosol can puncturing device. Inspector Francis observed that the hazardous waste label was marked with the following hazardous waste codes "D001, F003, F005", see photograph number 1. The walk-through continued to the Tool Crib. Mr. Delarosa showed Inspector Francis an area where Universal Waste is accumulated. Inspector Francis observed a container labeled "Universal Waste Used Lamps" (see photograph number 2) and a container for used batteries. The walk-through continued to the 3500 Ton Maintenance Shop area. Mr. Hawthorne showed Inspector Francis several containers and totes labeled "Used Oil", see photograph number 3. Mr. Hawthorne also showed Inspector Francis a shop rag station with clean towels and towels to be laundered by Industrial Towel and Uniform. The walk-through continued to the SGE Line. Mr. Delarosa showed Inspector Francis a new automated area for machining engine blocks. The walk-through continued to the GROB Room, an automated aluminum casting area. The walk-through continued to the Die Maintenance Area. Mr. Hawthorne showed Inspector Francis an area where parts are steam cleaned and two large totes containing washer sludge, see photograph number 4. The walk-through continued to the Tool and Die Shop and then to the 1600 Ton area. Inspector Francis observed one 55-gallon container (see photograph number 5) and three 5-gallon containers labeled "Waste Oil". The walk-through continued to the Alloy Foundry area. Mr. Hawthorne showed Inspector Francis several roll-off boxes of baghouse dust and dryer for any incoming secondary materials. Mr. Friedrichs mentioned that Nemak has seven baghouses. The walk-through continued to the shredder. Mr. Hawthorne showed Inspector Francis the shredder and mentioned that Nemak does not accept any electronic scrap mixed in with the scrap aluminum anymore. The walk-through continued to the hazardous waste accumulation area. Mr. Hawthorne showed Inspector Francis an area where the hazardous waste baghouse dust was accumulated before off-site shipment, see photograph number 7.

Mr. Hawthorne, Mr. Friedrichs and Inspector Francis went to the Environmental Office to review records.

Records Review

Mr. Hawthorne provided Inspector Francis with a waste profile on the aerosol can puncturing device waste stream from Envirosafe, profile number WS-02-1974 from 2014. Mr. Hawthorne provided Inspector Francis with current and historical waste profiles on the shredder baghouse dust. Inspector Francis also reviewed a waste profile on the Die Lube Sludge. Inspector Francis reviewed hazardous waste manifests from 2015, 2014, and 2013. The last out-bound hazardous waste shipment of D001 waste was to WRR Environmental, Eau Claire, Wisconsin (WID990829475) on September 22, 2015. The last outgoing universal waste shipment was on August 25, 2015 to Enviro-Safe Resource Recovery, Germantown, Wisconsin (WIR000142877). Used oil is picked up by Industrial Fluid Solutions, LLC, Sheboygan, Wisconsin

(WIR000144907). In addition, Mr. Hawthorne provided the inspector with a July 18, 2014 version of the Nemak Gateway Contingency Plan for the Sheboygan facility. Mr. Hawthorne provided Inspector Francis with weekly inspection records for the hazardous waste accumulation area for the years 2013, 2014 and 2015. In addition, Mr. Hawthorne provided training records for Mr. Derek Sellin, Mr. Steven Wilke, and Mr. William Mueller.

Closing Conference

The inspector conducted a closing conference with Mr. Brian Delarosa, Mr. Murray Hawthorne, Mr. Tom Friedrichs and Mr. Alan Kitchen, Nemak's North American Business Unit Environmental Health and Safety Manager via telephone. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Nemak Gateway would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed used oil labeling and the shredder baghouse dust. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and a University of Wisconsin Extension Solid and Hazardous Waste Education Center Environmental Programs brochure to Mr. Delarosa.

Attachments
Inspection Checklists.
Photographs.

Revision: 08/04/2015
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month , evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.190(2)
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	Y	662.190(2)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1). Summit Envir. #399013010	Y	662.190(2)
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.193(1)(b)
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2)

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	N	
B. Type of waste and frequency of shipments are specified in the contractual agreement.	—	662.191(1)(a)
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.	—	662.191(1)(b)
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	—	662.191(2)
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	Y	
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1).	Y	662.190(2)(a)
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR662.020(2)).	Y	662.190(2)(a)
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	Y	662.190(2)(a)
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	Y	662.190(2)(a)
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5)
K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5)

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	Y	662.193(1)(a)
M. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.193(1)(a)
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030).	Y	662.190.(2)
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031).	Y	662.190(2)
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)).	Y	662.190(2)
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	Y	662.190(2)
R. Placards are offered to the initial transporter (NR 662.033).	Y	662.190(2)

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1)
B. A copy of the LDR notification and certification for solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under ss. NR 661.02 to 661.06, or exempted from ch. 291, Stats., and chs. NR 660 to 673, subsequent to the point of generation.	Y	668.07(1)(h)
C. Generator complies with the prohibition against dilution of wastes.	Y	668.03
D. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1)
E. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1)
F. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N/A	668.07(1)
G. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	Y	668.07(1)
H. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h)
I. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	Y	668.07(1)(j)

Section 3: Land Disposal Restrictions

J. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1)
K. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2)
L. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	N/A	662.192(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	Y	662.193(3)
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	Y	662.193(1)(c)
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	Y	662.193(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.192(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	Y	662.192(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	Y	662.192(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.	Y	662.192(1)(d)

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 5: Preparedness and Prevention

E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.192(1)(d)

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time. HEALTH Room Assistants	N	662.192(1)(e)1
B. ALL of the following information is posted next to the telephone: Reception 1. Name and telephone number of the emergency coordinator. 2. Location of fire extinguishers, spill control material and, if present, fire alarm. 3. Telephone number of the fire department unless the generator has a direct alarm.	N	662.192(1)(e)2
C. In the event of an emergency, the emergency coordinator takes the following actions: 1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706. 2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. 3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil. 4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).	Y	662.192(1)(e)4
D. All employees are thoroughly familiar with proper waste handling and emergency Instruction procedures relevant to their responsibilities during normal operations and emergencies.	Y	662.192(1)(e)3

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8.	Y	
B. The accumulation start date is clearly marked and visible for inspection on each container. NO CONTAINERS IN ACCUMULATION	N/A	662.192(1)(d)1
C. All containers are clearly marked with the words "Hazardous Waste".	N/A	662.192(1)(d)2
D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	N/A	662.192(1)(b)
E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	N/A	662.192(1)(b)
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(1)(b)
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	N/A	662.192(1)(b)
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174). Weekly Inspections - 2013, 2014, 2015	Y	662.192(1)(b)
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	Y	662.192(1)(b)

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 7: Container Accumulation

J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.192(1)(b)
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.192(1)(b)

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9.	Y	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.192(4)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.192(4)(a)
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.192(4)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.192(4)(a)1
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.192(4)(a)2
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	Y	662.192(4)(a)1
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	Y	662.192(4)(b)
I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.192(4)(b)

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10. YES.	Y	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	Y	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2)
D. Used oil containers and tanks are marked "used oil". 160 TOTAL - WASTE OIL 5 DRUMS	N	679.22(3)(a)

Revision: 08/04/2015
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 9: Used Oil

E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement. WIR 000 144 507	Y	679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	Y	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11

Section 10: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 11. Enviro Safe Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	Y	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	Y	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	Y	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler. [illegible] 8/18/16	Y	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)
H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	Y	673.15(3)
i. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	Y	673.17

Section 10: Universal Waste

Question	Answer	Code
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	Y	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	N	

Section 11: Waste Minimization Certification

Question	Answer	Code
A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)). [illegible handwriting]	Y	662.190(2)(a)

Section 12: Generator Status Evaluation

Question	Answer	Code
A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month.	Y	662.190(1)
B. Waste is accumulated for 180 days or less.	Y	662.192(1)
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	Y	662.192(2)
D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	Y	662.192(1)(a)
E. Describe any other activities the generator is conducting at the facility.		

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Photograph #1 – QA Group Aerosol Can Puncturing Area, 55-Gallon SAA Container

Photograph #2 – Tool Crib, Universal Waste Accumulation Area

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Photograph #3 – 3500 Ton Shop Oil Storage Area, Used Oil Containers

Photograph #4 – Maintenance Die Area, Steam Cleaning Booth Sludge Tote

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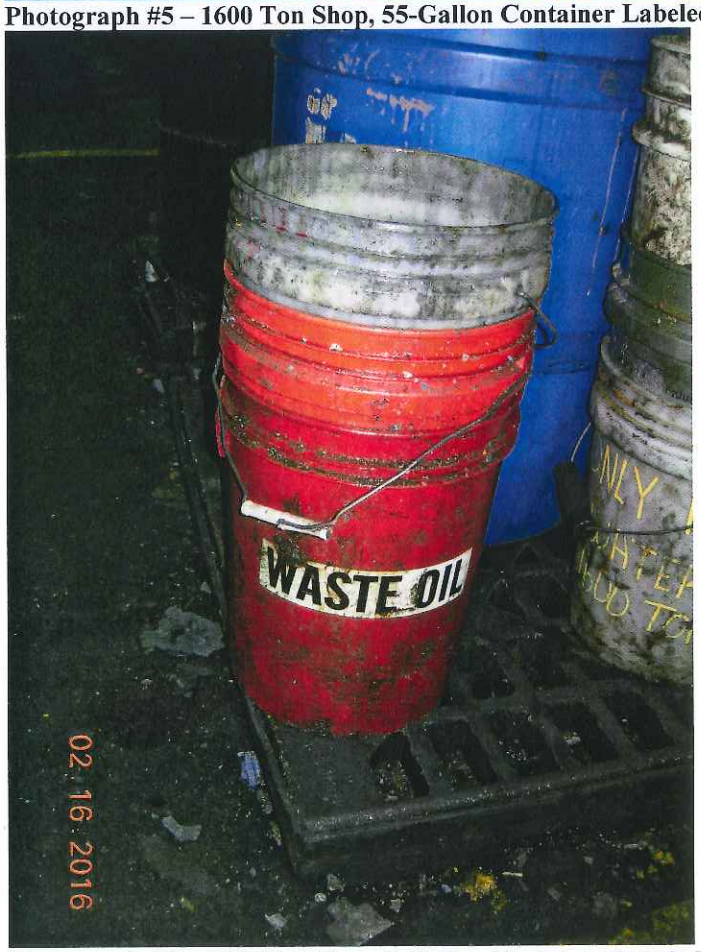
2/16/2016

Photograph #5 – 1600 Ton Shop, 55-Gallon Container Labeled Waste Oil



Photograph #6 – 1600 Ton Shop, 5-Gallon Container Labeled Waste Oil

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2/16/2016

Photograph #7 – Foundry Alloy Shop – Hazardous Waste Accumulation Area